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U.S. DOE - FMPC HAMILTON COUNTY OHD 6890 608 976 T-5/T-6 CLOSURE PLAN

12/17/90 OEPA/DOE-FSO 1 LETTER



State of Ohio Environmental Protection Agency

Southwest District Office

40 South Main Street Dayton, Ohio 45402-2086 (513) 285-6357 FAX (513) 285-6249 2451

Richard F. Celeste Governor

December 17, 1990

Re:

U.S. DOE - FMPC HAMILTON COUNTY OHD 6890 608 976 T-5/T-6 CLOSURE PLAN

Mr. Gerald Westerbeck
FMPC Site Manager
DOE - FMPC
P.O. Box 398705
Cincinnati, Ohio 45239-8705

Dear Mr. Westerbeck:

On June 8, 1990 and July 9, 1990, U.S. DOE-FMPC submitted a revised closure plan for the T-5 and T-6 hazardous waste storage tanks. Upon review of the plan, it was determined that the plan remains deficient in several areas. Attached to this letter are specific comments regarding the deficiency of the plan.

Please revise this closure plan in accordance with the comments and submit the revised plan to the Director, Ohio EPA, 1800 Watermark Drive, P.O. Box 1049, Columbus, Ohio 43266-0149, within thirty (30) days of receipt of this letter.

Call me at (513) 285-6357 if you have any comments.

Sincerely,

Paul D. Pardi

Group Leader, Hazardous Waste Unit Division of Solid and Hazardous Waste

PDP/mlf

Encl.

cc: Paul Vandermeer, DSHWM/CO

DEC 1 9 1990

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DOE - FMPC

Tanks T-5 and T-6 Closure Plan

NOD Comments

- 1) The language specified in OAC 3745-50-42(D) must be incorporated into the closure certifications.
- 2) The revised closure plan references on Appendix A. The revised closure plan did not include an Appendix A. Appendix A must be submitted to be attached to the revised closure plan.
- 3) The plan still does not address the mixed waste issue adequately. The plan must demonstrate that any waste generated during the closure process will be properly characterized. This means that supporting documentation must be provided should FMPC characterize any waste generated as mixed waste.
- 4) The sampling plan must be revised to indicate that samples from under the pad will be collected from the shallowest sampeable media.
- 5) The plan must detail procedures for soil removal should excavation and removal be necessary. The plan must address confirmation sampling and analysis after removal.
- 6) The plan should specify that should decontamination of the pad fail, the pad will be removed and disposed of properly. Provide details for these procedures.
- 7) The plan must provide the location of the background sampling points.
- 8) The plan must specifically describe the associated piping, lines, pumps, etc. that will be subject to decontamination procedures as part of this closure.